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15 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 **FEDERAL TRADE COMMISSION,**

17 Plaintiff,

18 v.
19

20 **OMICS GROUP INC., et al.,**

21 Defendants.
22

Case No. 2:16-cv-02022-GMN-VCF

**PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

ORAL ARGUMENT REQUESTED

23 Pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C.
24 § 53(b), and Federal Rule of Civil Procedure 65(a), Plaintiff Federal Trade Commission ("FTC")
25 respectfully moves this Court for a preliminary injunction against Defendants. In support of its
26 motion, the FTC states as follows:
27

- 1 1. The FTC brings this action to halt the deceptive representations carried out by a network
2 of interconnected companies in connection with the publication of online journals and the
3 organization of scientific conferences. Defendants OMICS Group Inc., iMedPub LLC,
4 Conference Series LLC, and Srinubabu Gedela (“Defendants”) claim to operate hundreds
5 of online academic journals on a wide variety of topics, including medicine, chemistry,
6 nursing, engineering, and genetics, among others. In order to persuade consumers to
7 submit articles to their journals for publication, Defendants make numerous
8 misrepresentations regarding the nature and reputation of their journals. Defendants also
9 fail to disclose that they charge significant fees in exchange for their publication services.
10 Finally, Defendants also make numerous misrepresentations in connection with the
11 marketing of their scientific conferences.
12
- 13 2. These acts and practices violate Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).
- 14 3. The FTC therefore seeks a preliminary injunction that:
15
16 a. Restrains Defendants from engaging in deceptive practices in connection with the
17 marketing and sale of academic journal publishing services and scientific conference
18 services;
19
20 b. Requires Defendants to identify all assets and make an accounting of their present
21 financial condition and certain business information; and
22
23 c. Requires Defendants to preserve records.
24
- 25 4. In support of this Motion, the FTC respectfully refers the Court to its Memorandum of
26 Points and Authorities in Support of Its Motion for Preliminary Injunction and Exhibits in
27 Support of Its Motion for Preliminary Injunction, filed together herewith.
5. The FTC has lodged herewith a proposed preliminary injunction.

1 WHEREFORE, the FTC respectfully requests that this Court grant this motion by entering
2 the proposed preliminary injunction.

3 Dated: September 8, 2016

Respectfully submitted,

4
5 DAVID C. SHONKA
Acting General Counsel

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 8, 2016, true and correct copies of (1) **PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**, (2) **PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION FOR PRELIMINARY INJUNCTION**, (3) **PLAINTIFF'S EXHIBITS IN SUPPORT OF ITS MOTION FOR PRELIMINARY INJUNCTION**, and (4) **[proposed] PRELIMINARY INJUNCTION** were filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

The undersigned further certifies that on September 8, 2016, true and correct copies of (1) **PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**, (2) **PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION FOR PRELIMINARY INJUNCTION**, (3) **PLAINTIFF'S EXHIBITS IN SUPPORT OF ITS MOTION FOR PRELIMINARY INJUNCTION**, and (4) **[proposed] PRELIMINARY INJUNCTION** were served by e-mail on the following, who are not registered participants of the CM/ECF System: Vijay Kumar and Ashok Ram Kumar.

/s/Gregory A. Ashe
Attorney for Plaintiff Federal Trade Commission